IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

In re: Maurice Dell Jones Dianne F Holmes Jones xxx-xx-4071 xxx-xx-0881 14142 E. 11th Street Tulsa OK 74108-0000 Debtor(s).	Case No. 13-11956-M Chapter 13

MOTION TO MODIFY PLAN AND FOR ATTORNEY FEES
AND NOTICE OF OPPORTUNITY FOR HEARING

NOTICE OF OPPORTUNITY FOR HEARING: Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Northern District of Oklahoma, 224 South Boulder, Tulsa, Oklahoma 74103 no later than **24** days from the date of filing of this request for relief. You should also mail a file-stamped copy of your response or objection to the undersigned movant's/movants' attorney (and others who are required to be served) and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the **requested relief without a hearing or further notice. The 24-day period includes the 3 days allowed for mailing provided for in Fed.R.Bankr.P. 9006(f).**

Debtors' attorney has spent a large amount of time dealing with Debtors' home mortgage. The mortgage holder filed a motion for relief from stay. Debtors at first contended they were current on their post-petition mortgage payments, but it was later determined that they were not. After many failed attempts by Debtors' attorney to persuade the mortgage holder to provide information about the mortgage, Debtors' attorney drafted an agreed order that required the mortgage holder to provide Debtors information regarding their mortgage, leaving the stay in effect until that information was provided. The stay is still in effect. The mortgage holder never provided the information or filed a proof of claim. As a result, the trustee filed a motion to disallow the mortgage holder's claim. The motion requested that the mortgage arrearage be disallowed and that the funds which the Bank of New York Mellon, or Ocwen Loan Servicing, LLC, would have otherwise been paid be released to the other creditors entitled to payment under the Plan. The Court entered an order disallowing the claim on February 11, 2015. The trustee has accumulated $11,972.49 from Debtors' plan payments, which if that claim had not been disallowed, would have been paid to the mortgage holder. With the claim denied, those funds are now available, and Debtors' attorney would like to be compensated for the time that he has spent. At the time that the agreed order was worked out with the mortgage holder, the intent was for Debtors' attorney to request compensation as part of a motion to modify the plan that would be filed to cure the post-petition arrearage (and to correct the pre-petition mortgage arrearage stated in the plan) once the mortgage holder provided the needed information. However, Debtors lost some of their income, and it turned out that they were unable to resume their regular mortgage payments.

Wherefore, Debtors move that the Court enter a text-only order stating, "It is ordered that there is awarded $4,290, comprised of $4,290 in compensation and $0 in expense reimbursement, to Huckabee & Huckabee, Inc., attorney for Debtors, for services and expenses rendered related to this case through the date of this motion in excess of the compensation that he has already received. It is ordered that the confirmed plan is modified to direct that the Trustee pay said amount in a single payment in month 18 of the plan. It is further ordered that the Order Confirming Chapter 13 Plan shall remain in effect except as modified herein."

The services rendered, time expended, and expenses incurred post-petition are set forth in the separate statement filed contemporaneously herewith.

Statement Pursuant to Fed. R. Bankr. P. 2002(b)(2): Applicant: Brian Huckabee. Amounts requested: See above.

Statements Pursuant to Fed. R. Bankr. P. 2016(a): The payments that have heretofore been made or promised to Applicant for services rendered or to be rendered in any capacity whatsoever in connection with the case: Debtors paid Applicant $700 pre-petition. Applicant received $1,800 in payments under the plan. The source of the compensation paid pre-petition: Debtors. The source of the compensation promised: Debtors. Whether any compensation previously received has been shared: No. Whether an agreement or understanding exists between the applicant and any other entity for the sharing of compensation received or to be received for services rendered in or in connection with the case: No. The particulars of any sharing of compensation or agreement or understanding therefor: None.

Additional Statement Regarding Compensation: All services for which compensation is sought were rendered by attorney Brian Huckabee at $250 per hour or by his firm's legal assistant at $75 per hour. The qualifications of these personnel are explained in the separate detailed time and expense statement.

Huckabee & Huckabee, Inc.

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